

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

In re:

Chapter 11

Hiawatha Manor Association, Inc.,

Case No. 25-01916

Debtor.

Judge Randal S. Mashburn

Supplemental Clarification to Exhibit A – Section D, Item 24
Filed in Connection with: Motion for Rule 2004 Production of Documents (Doc. No. 63)

Linda Simmons, a co-owner of the Debtor Association, respectfully submits this supplemental clarification to Exhibit A filed in connection with her Motion for Rule 2004 Production of Documents.

The purpose of this clarification is to correct and clarify Item 24 of Section D, which previously referred to authorization by the Hiawatha West Board. As Hiawatha West is not the Debtor in this proceeding, Movant lacks standing to compel documents from that entity. Accordingly, the following revised request is substituted:

Item 24 is hereby corrected to request documentation from the Debtor, Hiawatha Manor Association, Inc., regarding its own internal approval of the January 8, 2025 transfer.

Corrected Item 24:

24. Any resolutions, consents, meeting minutes, or other documentation reflecting approval or authorization by the Hiawatha Manor Association, Inc. Board to accept the January 8, 2025 transfer of 70 intervals from Hiawatha Manor West as satisfaction of a debt allegedly owed by West under the Shared Services Agreement.

This correction ensures the document request remains properly directed to the Debtor and concerns matters that may affect the administration of the Debtor's estate, including the treatment and disposition of the 70 intervals transferred on January 8, 2025.

Dated: August 4, 2025

Respectfully submitted,

/s/ Linda Simmons

Linda Simmons, *pro se*

9643 Chanteclair Circle

Highlands Ranch, CO 80126

Telephone: (615) 594-2866

Email: lindasimmons2866@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on August 4, 2025, I have served a true and correct copy of the Supplemental Clarification to Exhibit A — Section D, Item 24, by the methods indicated below:

The following parties were served via CM/ECF on all registered participants:

- Blake D. Roth – Counsel for Debtor
- C. Scott Kunde – Counsel for Debtor
- Thomas H. Forrester – Counsel for Lake Tansi Village POA
- Rebecca J. Yielding – Trial Attorney, Office of the U.S. Trustee
- Office of the United States Trustee

I also served a copy of the Supplemental Clarification by U.S. Mail to:

Lemonjuice Solutions
7380 W. Sand Lake Road, Suite 130
Orlando, FL

/s/ Linda Simmons

Linda Simmons, *pro se*

Telephone: (615) 594-2866

lindasimmons2866@gmail.com